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HONORABLE BENJAMIN H. SETTLE 1 2 3 4 5 UNITED STATES DISTRICT COURT 6 WESTERN DISTRICT OF WASHINGTON AT TACOMA 7 8 ROLANDO HERNANDEZ, NO. C04-5539BHS 9 Plaintiff. STIPULATION AND ORDER EXTENDING DEADLINE FOR 10 v. SUBMITTING PETITION FOR ATTORNEY'S FEES AND COSTS AND 11 CITY OF VANCOUVER and MARK **RULE 50(b) MOTION** TANNINEN, 12 NOTE ON MOTION CALENDAR: Defendants. Friday, May 9, 2014 13 14 STIPULATION 15 The parties hereby stipulate to and move the Court for an order staying the deadline for 16 plaintiff to submit petitions for attorney's fees and costs pursuant to Title VII and RCW 49.60, as 17 well as other post-trial relief, and for defendants to file a Fed. R. Civ. P. 50(b) motion. The 18 reason the parties request that these deadlines be stayed is that the parties are going to engage in 19 alternative dispute resolution to attempt to resolve all outstanding matters with respect to 20 plaintiff's claims in this lawsuit. By extending these deadlines, the Court will allow the parties 21 STIPULATION AND [PROPOSED] ORDER CHRISTIE LAW GROUP, PLLC EXTENDING DEADLINE FOR SUBMITTING 2100 WESTLAKE AVENUE N., SUITE 206 PETITION FOR ATTORNEY'S FEES AND SEATTLE, WA 98109 COSTS AND RULE 56(b) MOTION (C04-206-957-9669 5539BHS) - 1

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to engage in mediation without incurring possibly unnecessary attorney's fees and costs. The 1 parties would propose that, in the event mediation is unsuccessful, the deadline to file plaintiff's 2 petitions attorney's fees and costs, and other post-trial relief, and defendants' Rule 50(b) motion 3 be 28 days from the date of the mediation. This stipulated order is effective only if it has been 4 entered in the docket as an order of the Court no later than noon on May 12, 2014. 5 DATED this 9th day of May, 2014. 6 CHRISTIE LAW GROUP, PLLC 7 8 /s/ Robert L. Christie By ROBERT L. CHRISTIE, WSBA #10895 9 Attorney for Defendants 2100 Westlake Avenue N., Suite 206 10 Seattle, WA 98109 Telephone: (206) 957-9669 11 Fax: (206) 352-7875 Email: bob@christielawgroup.com 12 13 By /s/ Thomas S. Boothe THOMAS S. BOOTHE, WSBA #21759 14 Attorney for Plaintiffs 7635 Westmoor Way 15 Portland, OR 97225-2138 Phone: (503) 292-5800 16 FAX: (503) 292-5556 Email: tsb@boothehouse.com 17 18 19 20 21

STIPULATION AND [PROPOSED] ORDER EXTENDING DEADLINE FOR SUBMITTING PETITION FOR ATTORNEY'S FEES AND COSTS AND RULE 56(b) MOTION (C04-5539BHS) - 2

CHRISTIE LAW GROUP, PLLC 2100 WESTLAKE AVENUE N., SUITE 206 SEATTLE, WA 98109 206-957-9669

Case 3:04-cv-05539-RBL Document 453 Filed 05/12/14 Page 3 of 4 Case 3:04-cv-05539-BHS Document 452 Filed 05/09/14 Page 3 of 5 LAW OFFICES OF JUDITH A. LONNQUIST, 1 P.S. 2 By /s/ Judith A. Lonnquist JUDITH A. LONNQUIST, WSBA #06421 3 Attorneys for Plaintiffs 1218 Third Avenue, Suite 1500 4 Seattle, WA 98101-3021 Telephone: (206) 622-2086 5 Fax: (206) 233-9165 Email: lojal@aol.com 6 ORDER 7 Based on the foregoing stipulation, it is hereby ordered, adjudged and decreed that the 8 deadline to file plaintiff's petitions for attorney's fees and costs and other post-trial relief, and 9 defendants' Rule 50(b) motion is 28 days from the date of the planned mediation. This 10 stipulated order is effective only if it has been entered in the docket as an order of the Court no 11 later than noon on May 12, 2014. 12 DONE IN OPEN COURT/CHAMBERS this day of May, 2014. 13 14 HONORABLE BENJAMIN H. SETTLE 15 United States District Court Judge 16 111 17 111 18 111 19 /// 20 111 21

STIPULATION AND [PROPOSED] ORDER EXTENDING DEADLINE FOR SUBMITTING PETITION FOR ATTORNEY'S FEES AND COSTS AND RULE 56(b) MOTION (C04-5539BHS) - 3

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STIPULATION AND [PROPOSED] ORDER EXTENDING DEADLINE FOR SUBMITTING PETITION FOR ATTORNEY'S FEES AND COSTS AND RULE 56(b) MOTION (C04-5539BHS) - 4

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